

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

Criminal Action No. 15-CR-4268-JB

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANGEL DELEON,
JOE GALLEGOS,
EDWARD TROUP,
LEONARD LUJAN,
BILLY GARCIA,
EUGENE MARTINEZ,
ALLEN PATTERSON,
CHRISTOPHER CHAVEZ,
JAVIER ALONSO,
ARTURO ARNULFO GARCIA,
BENJAMIN CLARK,
RUBEN HERNANDEZ,
JERRY ARMENTA,
JERRY MONTOYA,
MARIO RODRIGUEZ,
TIMOTHY MARTINEZ,
MAURICIO VARELA,
DANIEL SANCHEZ,
GERALD ARCHULETA,
CONRAD VILLEGAS,
ANTHONY RAY BACA,
ROBERT MARTINEZ,
ROY MARTINEZ,
CHRISTOPHER GARCIA,
CARLOS HERRERA,
RUDY PEREZ,
ANDREW GALLEGOS,
SANTOS GONZALEZ,
PAUL RIVERA, AND
SHAUNA GUTIERREZ,
BRANDY RODRIGUEZ.

Defendants.

DEFENDANT BILLY GARCIA'S NOTICE PURSUANT TO FED. R. CRIM. P. 16(b)

Defendant Billy Garcia, to the best of his current ability, hereby provides notice, as required by Federal Rule of Criminal Procedure 16 (b), of the following information:

1. Photograph books, papers, documents, data, photographs, tangible objects, buildings or places - The defense intends to use materials provided in discovery by the government. The government has not concluded its disclosures and has indicated it will not conclude its disclosures until two weeks prior to trial. As such the defense is not currently in a position to know what specific materials it will use at trial and reserved the right to update this notice after receipt of all materials from the government.

2. Reports of Examinations and Tests - The defense has no scientific tests or experiments to disclose at this time. As the government continues to disclose materials there may be a need to conduct tests and examinations and when such tests or examinations are concluded any material required to be disclosed will be disclosed.

3. Expert Witnesses - The defense may call as a witness Dr. Phillip B. Danielson, who holds a doctorate in Biology, specializing in DNA analysis. Dr. Danielson will testify regarding the tests conducted by the government's experts, and the results and conclusions of those tests involving DNA as to the homicide of F.C. and R.G. See Exhibit A, Curriculum Vitae of Phillip B. Danielson.

The defense reserves the right to supplement this notice if the government endorses any additional experts and upon the completion of the discovery process in this case.

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2017 I filed the foregoing electronically through the CM/ECF system, which caused all counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

/s/ Robert R. Cooper
ROBERT R. COOPER